

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

<div>WAG Acquisition, L.L.C., Plaintiff, v. Multi Media, L.L.C., <i>et al.</i>, Defendants.</div>	Civil Action No. 2:14-cv-02340 (ES)(MAH) <i>Document electronically filed.</i> Return Date: March 7, 2016 Oral Argument Requested
<div>WAG Acquisition, L.L.C., Plaintiff, v. Data Conversions, Inc., <i>et al.</i>, Defendants.</div>	Civil Action No. 2:14-cv-02345 (ES)(MAH)
<div>WAG Acquisition, L.L.C., Plaintiff, v. Flying Crocodile, Inc., <i>et al.</i>, Defendants.</div>	Civil Action No. 2:14-cv-02674 (ES)(MAH)

WAG Acquisition, L.L.C., Plaintiff, v. Gattyán Group S.à r.l., <i>et al.</i> , Defendants.	Civil Action No. 2:14-cv-02832 (ES) (MAH)
WAG Acquisition, L.L.C., Plaintiff, v. FriendFinder Networks Inc., <i>et al.</i> , Defendants.	Civil Action No. 2:14-cv-03456 (ES)(MAH)
WAG Acquisition, L.L.C., Plaintiff, v. Vubeology, Inc., <i>et al.</i> , Defendants.	Civil Action No. 2:14-cv-04531 (ES)(MAH)
WAG Acquisition, L.L.C., Plaintiff, v. WebPower, Inc., <i>et al.</i> , Defendants.	Civil Action No. 2:15-cv-03581 (ES)(MAH)

**NOTICE OF DEFENDANTS' JOINT MOTION TO
BIFURCATE LIABILITY AND DAMAGES DISCOVERY**

To: Clerk, United States District Court
District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07102

Ronald Abramson
David G. Liston
Ari J. Jaffess
LEWIS BAACH pllc
The Chrysler Building
405 Lexington Avenue
New York, NY 10174
Telephone: (212) 826-7001

*Attorneys for Plaintiff
WAG Acquisition, LLC*

COUNSEL:

PLEASE TAKE NOTICE that on March 7, 2016, or on a date and time to be set by the Court, Defendants in the above-captioned actions (collectively, the “Moving Defendants”), through their respective counsel, will jointly move before the Honorable Michael A. Hammer, U.S.M.J. for the entry of an Order bifurcating liability and damages discovery.

PLEASE TAKE FURTHER NOTICE that in support of this joint Motion, Moving Defendants shall rely on the accompanying Memorandum of Law in

Support of Defendants' Joint Motion For Bifurcation, as well as all pleadings and memoranda on file in these actions.

PLEASE TAKE FURTHER NOTICE that Moving Defendants respectfully request oral argument.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is submitted herewith.

PLEASE TAKE FURTHER NOTICE that a Certification attesting to the date and manner of service also is submitted herewith.

Dated: February 11, 2016

Respectfully submitted,

s/ Justin T. Quinn

Keith J. Miller

Justin Quinn

ROBINSON MILLER LLC

One Newark Center

Newark, NJ 07102

Telephone No.: (973) 690-5400

Facsimile No.: (973) 466-2760

KMiller@rwmlegal.com

JQuinn@rwmlegal.com

OF COUNSEL:

Frank M. Gasparo (*Pro Hac Vice*)

Ralph A. Dengler (*Pro Hac Vice*)

Todd M. Noshier

Andrew P. MacArthur

VENABLE LLP

1270 Avenue of the Americas

New York, New York 10020

Telephone No.: (212) 307-5500

Facsimile No.: (212) 307-5598
FMGasparo@venable.com
RADengler@venable.com
TMNosher@venable.com
APMacArthur@Venable.com

*Attorneys for Defendants FriendFinder
Networks Inc., Streamray Inc., Multi Media,
LLC, WMM, LLC and WMM Holdings,
LLC, and WebPower*

s/ David A. Ward
David A. Ward, Esq.
KLUGER HEALEY, LLC
219 Broad Street
Red Bank, New Jersey 07052
Telephone: (732) 852-7500
dward@klugerhealey.com

Brian G. Bodine (*Pro Hac Vice*)
Steven B. Winters (*Pro Hac Vice*)
Adriane M. Scola (*Pro Hac Vice*)
LANE POWELL PC
1420 Fifth Ave., Suite 4200
Seattle, WA 98111-9402
Telephone: (206) 223-7000
bodineb@lanepowell.com
scolaa@lanepowell.com
winterss@lanepowell.com

*Attorneys for Defendants Flying Crocodile,
Inc., FCI, Inc., Accretive Technology Group,
Inc., ICF Technology, Inc., Riser Apps LLC,
Streamates Ltd., Streamates Ltd. d/b/a
Streamates Ltd., LLC, and Vubeology, Inc.*

s/ Justin T. Quinn

Keith J. Miller

Justin Quinn

ROBINSON MILLER LLC

One Newark Center

Newark, NJ 07102

Telephone No.: (973) 690-5400

Facsimile No.: (973) 466-2760

KMiller@rwmlegal.com

JQuinn@rwmlegal.com

OF COUNSEL:

Kevin O'Brien (*Pro Hac Vice*)

Richard V. Wells (*Pro Hac Vice*)

BAKER & MCKENZIE, LLP

815 Connecticut Avenue, N.W.

Washington, D.C. 20006

Telephone No.: (202) 835-6143

Facsimile No.: (202) 416-7143

Kevin.O'Brien@bakermckenzie.com

Richard.Wells@bakermckenzie.com

*Attorneys for Defendants Gattyán Group S.à
r.l., Duodecad IT Services Luxembourg S.à
r.l. and Duodecad IT Services USA LLC*

CERTIFICATE OF SERVICE

I, **JUSTIN T. QUINN**, hereby certify that on February 11, 2016, I caused a true and correct copy of the Moving Defendants' Notice of Joint Motion to Bifurcate Liability and Damages Discovery, as well as all supporting papers, to be served on the following attorneys *via* the Court's CM/ECF system:

Ronald Abramson
David G. Liston
Ari J. Jaffess
LEWIS BAACH pllc
The Chrysler Building
405 Lexington Avenue
New York, NY 10174
ronald.abramson@lewisbaach.com
david.liston@lewisbaach.com
ari.jaffess@lewisbaach.com

I further certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: February 11, 2016

s/ Justin T. Quinn
Justin T. Quinn